1300 552 687
info@januselectric.com.au
www.januselectric.com.au
Janus Electric Holdings Limited
5 Catamaran Road
Fountaindale, NSW 2258

ASX ANNOUNCEMENT

14 August 2026

Revised Securities Trading Policy

Janus Electric Holdings Limited (ASX: JNS; FSE: E3C) ("Janus" or "the Company") encloses a copy of the Company's revised Securities Trading Policy in accordance with ASX Listing Rule 12.10.

This announcement has been authorised for release to ASX by the Board of Janus Electric Holdings Limited.

About Janus Electric

Janus Electric is an Australian innovator in heavy vehicle electrification, offering a turnkey solution through its patented battery swap platform, truck conversion kits, charging infrastructure and integrated fleet management software. Janus delivers a zero-emissions, full-service electrification model for the freight and logistics sector, supporting operations across Australia, with international deployments in the United States and Canada. Its Central Coast-based production facility underpins its national and international deployment strategy

1300 552 687
info@januselectric.com.au
www.januselectric.com.au
Janus Electric Holdings Limited
Corporate House, Kings Row 1,
Level 2, 52 McDougall Street
Milton QLD 4064, Australia
ABN: 55 095 006 090

DRIVING THE FUTURE OF ZERO EMISSION TRANSPORT

Securities Trading Policy

CONTENTS

1. POLICY OBJECTIVES

Directors, employees, and other shareholders are encouraged to be long-term holders of the Company's shares. However, care must be taken in the timing of any acquisition or disposal of the Company's securities.

The objective of this Policy is:

a. To ensure that the Directors and employees are aware of and do not inadvertently breach the insider trading provision of the *Corporations Act 2001* when dealing in securities in the Company (including shares and options); and
b. To assist in maintaining market confidence when trading the Company's securities.

2. WHO DOES THIS POLICY APPLY TO?

2.1. PEOPLE COVERED

This Policy applies to all Directors, the Company Secretary, and all executives and employees of the Company and their associates. An associate of a person covered by this Policy includes their family members, trusts, companies, nominees and other persons over whom a Designated Person has, or may be expected to have, investment control or influence.

In this Policy, Senior Management means the Company Secretary and all senior executives.

2.2. SECURITIES COVERED

This Policy applies to all securities issued by the Company from time to time, including ordinary shares and options.

A reasonable person expects information to have a material effect on the price or value of securities if that information would, or would be likely to, influence persons who commonly invest in securities in deciding whether or not to subscribe for, buy or sell the securities.

Janus Electric Holdings Limited is not required to give the ASX information if:

a. A reasonable person would not expect the information to be disclosed; and
b. The information is confidential and the ASX has not formed the view that the information has ceased to be confidential; and
c. One or more of the following conditions apply:
    I. It would be a breach of the law to disclose the information;
    II. The information concerns an incomplete proposal or negotiation;
    III. The information comprises matters of supposition or is insufficiently definite to warrant disclosure;
    IV. The information is generated for internal management purposes, or
    V. The information is a trade secret.

If the ASX considers that there is, or is likely to be, a false market in Janus Electric Holdings Limited securities and asks Janus Electric Holdings Limited for information to correct or prevent it, Janus Electric Holdings Limited must give the ASX the information needed to correct or prevent the false market.

This document refers to price-sensitive information that Janus Electric Holdings Limited must disclose to the ASX under its continuous disclosure obligations.

3. WHAT IS INSIDER TRADING?

3.1. INSIDER TRADING

If a person covered by this Policy has Inside Information relating to the Company, it is illegal for the person to:

a. Buy, sell or otherwise deal in securities in the Company;
b. Advise, procure or encourage another person (for example, a family member, a friend, a family company or trust) to buy or sell the Company's securities; or
c. Pass on information to any other person if you know or ought to reasonably know that the person may use the information to buy or sell (or procure another person to buy or sell) the Company's securities.

3.2. INSIDE INFORMATION

Inside Information is information which is not generally available to the market and, if it were generally available to the market, would be likely to:

a. Have a material effect on the price or value of any company's securities (not just the Company's securities); or
b. Influence persons who commonly invest in securities in deciding whether or not to buy or sell the Company's securities.

Information is generally available if:

a. It consists of readily observable matter;
b. It has been made known in a manner likely to bring the information to the attention of people who commonly invest in securities of a kind whose price or value might be affected by the information, and, since it was made known, a reasonable period for it to be disseminated among such persons has elapsed;
c. It is derived from information which has been made public; or
d. It consists of observations, deductions, conclusions or inferences made or drawn from other generally available information.

It does not matter how or where you obtain inside Information - it does not have to be from the Company or about the Company to constitute Inside Information.

Examples of Inside Information could be:

a. The financial performance of the Company against its budget;

b. Changes in the Company's actual or anticipated financial condition or business performance;
c. Changes in the capital structure of the Company, including proposals to raise additional equity or borrowings;
d. Proposed changes in the nature of the business of the Company;
e. Changes to the Board or significant changes in key management personnel;
f. An undisclosed significant change in the Company's market share;
g. Likely or actual entry into, or loss of, a material contract;
h. Material acquisitions or sales of assets by the Company or its portfolio entities;
i. A proposed dividend or other distribution or a change in dividend policy; or
j. A material claim against the Company or other unexpected liability.

3.3. PENALTIES FOR NON-COMPLIANCE

Insider trading is a criminal offence punishable by significant fines, jail terms, or both.

Further, ASIC may seek civil penalties against a person and may even seek a court order to disqualify the person from managing a corporation.

In addition, the insider trader and any other person involved in the contravention may be liable to compensate third parties for any resulting loss.

The company will treat non-compliances seriously, and breaches of this Policy, whether or not they result in a breach of the law, may result in disciplinary action, including dismissal.

4. POLICY

No trading when in possession of inside Information

No person to whom this Policy applies may deal with any security at any time if they have inside information.

4.1. This prohibition applies at all times, including during a permitted trading window, outside a nominated blackout period, where the trading would otherwise fall within an excluded trading category under section 4.2, or where prior written clearance to trade has been given under section 4.3. Clearance to trade granted under this Policy is not an endorsement of the proposed trade, and the person trading remains individually and solely responsible for determining whether they are in possession of Inside Information and for their compliance with insider trading laws.BLACKOUT PERIODS

A person covered by this Policy may trade in securities at any time, but only if:

a. There is no blackout period in place; and
b. They have no Inside Information; and
c. The trading is not for short-term or speculative gain.

The Board, the Managing Director or the Company Secretary may implement a blackout period immediately via written notification (generally distributed by email) from the Company Secretary. When a blackout period is implemented, no one covered by this policy is permitted to trade in the securities of the Company. The Company Secretary will communicate in writing the lifting of a blackout period.

In addition to the above, there are designated blackout periods each year as follows:

a. the period each year from the close of trading at the end of the full financial year until 10.00am on the next trading day following the date of announcement to ASX of the preliminary final statement or full year results;
b. the period each year from the close of trading at the end of the half financial year on 31 December until 10.00am on the next trading day following the date of announcement of half-yearly results;
c. the period 2 weeks prior to the announcement of the quarterly results;
d. within 24 hours after the release of market sensitive information under ASX Listing Rule 3.1; and
e. at any other times as the Board of Directors prohibits from time to time.

4.2. EXCLUDED TRADING

A person covered by this Policy may trade in securities during a blackout period if that trading falls within one of the following categories of "excluded trading", provided they do not possess Inside Information.

a. Transfers of securities already held from a person's own name into a superannuation fund to which that person is a beneficiary;
b. An investment in, or trading in units of, a fund or other scheme where the assets of the fund or other scheme are invested at the discretion of a third party;
c. Undertakings to accept, or the acceptance of, a takeover offer;
d. Trading under an offer or invitation made to all or most members, such as a rights issue or a share purchase plan;
e. A disposal of Janus Electric Holdings Limited shares that is the result of a secured lender exercising their rights, for example, under a margin lending arrangement; or
f. Trading under any employee incentive scheme in accordance with the rules of a Board-approved Incentive Plan.

4.3. OTHER AUTHORISED TRADES

A person covered by this Policy may trade in securities during blackout periods only if they are personally satisfied that they do not have Inside Information and:

a. In the case of Directors, they have obtained the approval of the Chairman or in the case of any proposed trade by the Chairman, of another non-executive Director nominated by the Board for the purpose;
b. In the case of Senior Management, they have obtained the approval of the Managing Director, and
c. In the case of others, they have obtained the approval of the Company Secretary, or in their absence, the Corporate Affairs Manager.

Approval to trade during blackout periods may only be given where:

a. The person is in severe financial hardship, or other exceptional circumstances exist; and
b. The approvers are satisfied that there is no Inside Information which has not been disclosed to ASX Limited.

The following are examples of situations of severe financial hardship or other exceptional circumstances which the approvers may consider sufficient to warrant approval under the previous paragraph:

a. "**Severe financial hardship**" could include (but is not limited to) the applicant having a pressing financial commitment that cannot be satisfied otherwise than by selling the relevant Janus Electric Holdings Limited shares; and
b. "**Exceptional circumstances**" could include (but is not limited to) where a court order requires the applicant, or there are court enforceable undertakings, for example, in a bona fide family settlement, to transfer or sell Janus Electric Holdings Limited shares or there is some other overriding legal or regulatory requirement for him or her to do so.

An applicant seeking clearance to trade must satisfy the approvers that they are in severe financial hardship or that their circumstances are otherwise exceptional and that the proposed sale or disposal of the relevant Janus Electric Holdings Limited shares is the only reasonable course of action available.

Only the approving person may determine whether the applicant is in severe financial hardship or whether a particular set of circumstances exists.

Permission will be given for trading pursuant to this section 4 only after a written request for approval is provided (whether by letter, facsimile, electronic or other form of visible communication) and only if the approving person is satisfied that the transaction would not be:

a. Contrary to law;
b. For speculative gain;
c. To take advantage of inside knowledge; or
d. Seen by the public, press, other shareholders or ASX as unfair.

A written request for approval under this section must include a certification by the applicant that, to the best of their knowledge, they are not in possession of any Inside Information that would preclude them from trading in the Company's securities at that time.

If approval is given, the trade must be executed within two business days of the approval.
Any approval given under this section 4.3 may be given or refused by the Company in its absolute discretion, without giving reasons, and may be withdrawn at any time before the trade is executed if new information comes to light or there is a change in circumstances. A decision to refuse approval is final and binding on the person seeking it. A person whose request for approval is refused must keep that fact, and the fact that a request was made, confidential and must not disclose it to any other person.Even if approval is granted, the applicant remains personally responsible for assessing whether the insider trading prohibitions apply to them. If, after receiving approval to trade, the applicant comes into possession of Inside Information, they must not proceed with the trade notwithstanding that approval.

4.4. DISCLOSURE TO THE COMPANY

Senior Management must advise the Company Secretary in writing of the details of completed transactions within three business days following each transaction. The required details include the name of the shareholder, the date of transaction, the type of transaction (purchase, sale, etc.), the number of securities, and the price per security. Notification is necessary whether or not prior authority has been required.

The Company Secretary must maintain a register of securities transactions for the purposes of this Policy.

The Company must comply with its obligations to notify ASX in writing of any changes in the holdings of securities or interest in securities by Directors.

5. FURTHER RESTRICTIONS

5.1. MARGIN LENDING

Persons covered under this Policy are not permitted to enter into margin lending arrangements in relation to the Company's securities. This is on the grounds that the terms may require the Company's securities to be sold during a Closed Period or when the person possesses Inside Information.

This restriction does not extend to other funding arrangements where the Company's Securities may be included as security. Persons covered under this policy should consult the Secretary if they are uncertain whether an arrangement should be classified as a margin lending arrangement.

5.2. NO SHORT-TERM OR SPECULATIVE TRADING

The Company encourages long-term investment in the Company.

Persons covered under this Policy must not engage in short-term or speculative trading in the Company's securities or in financial products associated with the Company's securities. Short term means, in less than a 6-month period.

Persons covered under this Policy are not permitted to engage in short selling of the Company's securities.

5.3. NO HEDGING

Subject to the law, persons covered under this Policy must not:

Enter into transactions or arrangements with anyone which could have the effect of limiting their exposure to risk relating to an element of their remuneration that:

a. Has not vested; or
b. Has vested but remains subject to a holding lock; or

Deal at any time in financial products associated with the Company's Securities, except for the type of dealing permitted by law or a permitted dealing under this Policy

5.4. DERIVATIVES

Designated Persons must not trade in any derivative products issued by the Company. Derivative products that the Company issues over its securities include warrants, options and contracts for difference.

5.5. MEANING OF FINANCIAL PRODUCTS

Financial products include derivatives, options, warrants, futures, forward contracts, swaps and contracts for difference issued or created over or associated with the Company's Securities by third parties.

6. COMPLIANCE

Compliance with the rules in this Policy is mandatory and a condition of each employee's employment. Infringement of the insider trading provisions can attract a substantial monetary penalty, imprisonment, or both, in addition to loss of employment or other disciplinary action.

Any person who does not comply with this Policy will be considered to have engaged in serious misconduct, which may result in the termination of their engagement by the Company.

The Chairperson has ultimate discretion regarding granting a waiver of the requirements of this Policy to allow persons restricted by this Policy to trade in the Company's Securities, provided that doing so would not be illegal.

The Chairperson can give or refuse a waiver in absolute discretion. The Chairperson’s decision to refuse a waiver is final and binding on the person seeking the waiver.

7. REVIEW AND PUBLICATION OF THIS POLICY

The Board will review this Policy annually to ensure its effectiveness and determine whether any changes are required. The Board may amend this policy by resolution.

Approved by the Board on August 12, 2026